

Steven L. Beshear Governor Michael W. Hancock, P.E. Secretary

July 25, 2011

Mr. Julius Genachowski Chairman Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: FCC File No. SAT-MOD-201011118-00239

Dear Mr. Genachowski,

This letter is written on behalf of the Division of Highway Design in the Kentucky Transportation Cabinet. We would like to express our concern about the LightSquared system proposed to operate the ancillary terrestrial component of their mobile satellite service in the bands adjacent to those used by GPS.

The Kentucky Transportation Cabinet has made a significant investment in GPS technology over the past decade. We have a statewide network of permanently mounted GPS base stations that provides real time corrections as a free service to all sectors. We also have survey grade GPS equipment in use at each transportation district. The \$3.3 million investment in GPS technology has been funded through state Capital Project grants and federal Height Modernization grants.

The potential widespread implementation of 4G/LTE broadband as proposed by LightSquared may interfere with our GPS technology. We would not be able to quickly fund new equipment, additional filtering equipment or retrofit existing equipment to compensate for such interference. Loss of the productivity gained by the use of GPS technology in road design and construction is a very real concern if licenses are granted to implement this technology.

Advancing broadband deployment should not come at the expense of previously established, critical assets. GPS is an integral part of Kentucky's infrastructure. We would request that any organization proposing services in bands immediately adjacent to the radio navigation satellite service band bear the responsibility of eliminating interference to GPS.



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Thank you for allowing us to comment on the proposed broadband deployment. If you have any questions or would like to discuss, please do not hesitate to contact me.

Sincerely,

Jeff Jasper, P.E.

Director

Division of Highway Design Kentucky Transportation Cabinet

200 Mero Street, 5th Floor

Frankfort, KY 40622

(502)564-3280

Jeff.Jasper@ky.gov